

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

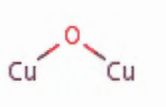


United States  
Environmental Protection  
Agency

Office of Pesticide Programs

Antimicrobials Division (AD)

May 22, 2013

EPA Reg#: 84542-RR		DP Barcode: 411812	
		Submission #: 933038	
Product name: CUPRON ANTI-FUNGAL FIBERS AND FABRICS III		Registrant: Cupron, Inc.	
Reviewer's name: Juan F. Negrón		AD/PSB/CTT- Product Chemistry Review	
Agency due date: 06/07/13		PSB received date: 05/15/13	
CTT received date: 05/15/13		Science due date: 04/12/13	
Formulation type: EUP		Sub data package due date: 04/24/13	
Integrated system: <input type="checkbox"/>	Non integrated system: <input checked="" type="checkbox"/>	Food use: <input type="checkbox"/>	Non food use: <input checked="" type="checkbox"/>
Action Code: A540		Date Completed: 05/22/13	
PC Code(s)	CAS #(s)	Active Ingredient Names	% wt (label)
025601	1317-39-1	Cuprous oxide	1.95
Molecule structure (optional):			
			
Test Lab:			
MRID: 49087000, 49087001			
Approver: Karen P. Hicks		Approved date: 05/22/13	
Guideline:			
Comments: OPPTS 830.7520 Particle size diameter distribution for copper (I) oxide. The reviewer had some concern about the density of the product shown on the CSF. The density of a solid cannot be the same as water. The registrant has confirmed that the value was calculated using the ASTM D792 for solid based on liquid displacement.			

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**MEMORANDUM**

**Subject:** Product Chemistry Review for EPA Reg # 84542-RR  
**Product name:** CUPRON ANTI-FUNGAL FIBERS AND FABRICS III  
DP #411812

**From:** Juan F. Negrón, Chemist   
Product Science Branch, CT Team  
Antimicrobials Division (7510P)

**Thru:** Karen P. Hicks, CT Team Leader  
Product Science Branch  
Antimicrobials Division (7510P)



**To:** Jacqueline Campbell-McFarlane / Jaclyn Carl  
PM Team 34

**Applicant:** Cupron, Inc.

**Action code:** A540

**Due date:** 06/07/13

**Product Formulation**

**Active Ingredient from label:**

	% by wt.
Cuprous oxide	1.95

## **BACKGROUND:**

On behalf of the registrant, Cupron, Inc., the consultant, Ag-Chem Consulting, is submitting an OPPTS 830.7520 guideline in support of the new end use product, "CUPRON ANTI-FUNGAL FIBERS AND FABRICS III." The product is used for machine wash. The Product Chemistry Reviewer has reviewed the following documents:

- A letter, dated 03/21/13. MRID # 49087000.
- A study titled "Particle Size Diameter Distribution for Copper (I) Oxide" dated 03/22/13 MRID # 49087001.

## **FINDINGS:**

1. The OPPTS 830.7520 study has been conducted by SCM Metal Products laboratory, sponsored by the registrant and the author is Dr. Matthew Brooks. The study was completed on 03/22/2013.
2. The study suggested that it was not conducted and reported in compliance with the requirements of the Good laboratory Procedure (GLP) set forth in Title 40, Part 160 of Code of Federal Regulations of the USA because no inspections were conducted and no audits were conducted on the raw data or the report in the laboratory. However, the consultant has indicated that the study was conducted in a laboratory equipped to conduct solid state particle analysis. The analysis was conducted by an experienced chemist and all records concerning, sampling, instrument calibration and results determination were collected and are maintained onsite at the facility.
3. Although the product is an EUP non-integrated system, the OPPTS 830.7520 is not required to be submitted. However, since the product is solid it is possible that the product might involve nano particle size in which case a study must be submitted to satisfy the OPPTS 830.7520 guideline. The Agency requested the study.

**See confidential Appendix (CBI).**

